

# **EXHIBIT 3**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE DYNAMIC RANDOM ACCESS  
MEMORY (DRAM) ANTITRUST  
LITIGATION

Master File No. M-02-1486 PJH (JCS)

MDL No. 1486

**[PROPOSED] ORDER  
AUTHORIZING CLASS COUNSEL  
TO WITHDRAW SETTLEMENT  
FUNDS FOR LITIGATION  
EXPENSES**

This Document Relates to:

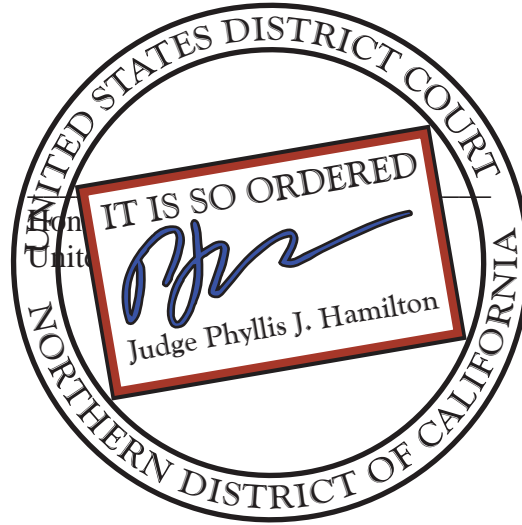
ALL DIRECT PURCHASER ACTIONS

Pursuant to the Petition of Class Counsel For The Advancement of Litigation Expenses From Settlement Funds submitted to the Court, and the Courts having reviewed Class Counsel's submission,

IT IS HEREBY ORDERED that Union Bank of California, as escrow agent, is hereby authorized to disburse the sum of \$1,000,000.00 from the Samsung Settlement Fund and \$1,000,000.00 from the Hynix Settlement Fund for advancement of litigation expenses of Class Counsel, said sum to be disbursed at the direction of Co-lead Counsel, Guido Saveri, Anthony D. Shapiro and Fred T. Isquith. Said Counsel shall report to the Court, in such manner as the Court shall direct, with respect to monies withdrawn from the fund and expended.

**IT IS SO ORDERED.**

Dated: February 14, 2007



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